

To: Webster, David[Webster.David@epa.gov]; Houlihan, Damien[houlihan.damien@epa.gov]
From: Deegan, Dave
Sent: Tue 9/29/2015 6:06:19 PM
Subject: FW: Region 1 correction re.: draft Steam Electric Rule docs

Hi Dave & Damien,

Just wanted to copy you on this exchange – I imagine everything is ok, but in case you are concerned that OW maybe hasn't made the right connections in our office, I thought it wouldn't hurt to send this to you.

Hope I'm not stirring anything up unnecessarily...

Dave

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Dave Deegan

U.S. EPA, New England Regional Office

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**From:** Loop, Travis  
**Sent:** Tuesday, September 29, 2015 12:10 PM  
**To:** Deegan, Dave  
**Cc:** Grantham, Nancy; Purchia, Liz; Allen, Laura  
**Subject:** RE: Region 1 correction re.: draft Steam Electric Rule docs

We are looking at why a closed plant is listed. But our people have already spoken to your people about how the list is of facilities that will incur cost and have to put technology in place. Those other facilities are covered under the rule but already have tech in place.

From our staff:

“I believe folks may not be reading the materials carefully (or they were edited incorrectly after I passed them on). The list we generated is NOT a list of those subject to the rule. It is a list of the plants we expect to incur costs as a result of the rule. The information below is consistent because as described below the two facilities in question would not be expected to incur costs (that is incremental costs over and above what they already spend).”

Travis Loop

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**From:** Deegan, Dave  
**Sent:** Tuesday, September 29, 2015 11:56 AM  
**To:** Loop, Travis  
**Cc:** Grantham, Nancy; Purchia, Liz; Allen, Laura  
**Subject:** Region 1 correction re.: draft Steam Electric Rule docs

Hi Travis,

The plant identified in the materials you shared yesterday appears to be wrong.

Yesterday's materials included the Mt. Tom Station in Holyoke MA. This power plant closed in late 2014 and is no longer operating. So we're not sure we should say anything about the rule as it applies to this plant.

However, the PSNH Merrimack power plant in Bow NH is operational and will be subject to these new rules. A summary from our permitting program is below.

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Merrimack Station in Bow, NH primarily burns coal and operates with an electrical output of 478 megawatts (MW). The facility currently utilizes a once-through cooling system designed to withdraw up to 287 million gallons per day (MGD) of water from the Hooksett Pool portion of the Merrimack River (85 MGD for Unit 1 and 202 for Unit 2) and then to discharge the heated water back to the river. Permitting issues include 1) the thermal discharge and the company's 316(a) variance request, 2) Cooling Water Intake Structures 316(b) requirements, and 3) effluent limits for a new New Flue Gas Desulfurization (FGD) Unit. The draft permit was released 9/30/2011. In 2014, EPA re-proposed a revision to the draft permit regarding the FGD requirements. A final permit is expected in FY2016 which will be in compliance with the new 316(b) Existing Facilities Rule and the new Steam Electric Power Plant Rule.

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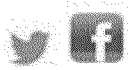
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From: Loop, Travis
Sent: Monday, September 28, 2015 1:57 PM
To: PADs and Alternates
Cc: Purchia, Liz; Harrison, Melissa; Lee, Monica; Allen, Laura; Abrams, Dan
Subject: draft Steam Electric Rule docs

PADS

We will announce the final Steam Electric Power Plant rule this Wednesday, Sept 30. Attached are draft documents – the press release and roll out plan. Please note the list of 134 facilities that will be impacted by this rule in the roll out doc, which are organized by state. Please let me know if you have any questions.

Here is what this is about:

The rule will reduce the discharge of toxic pollutants into America's waterways from steam electric power plants by 1.4 billion pounds annually, as well as reduce water withdrawal by 57 billion gallons per year.

Steam electric power plants account for about thirty percent of all toxic pollutants discharged into streams, rivers and lakes from permitted industrial facilities in the United States. These toxic pollutants include mercury, arsenic, lead, and selenium, which can cause neurological damage in children, lead to cancer, and damage the circulatory system, kidneys, and liver. Toxic metals also do not break down in the environment and can contaminate sediment in waterways and impact aquatic life and wildlife, including large-scale die-offs of fish. Due to their close proximity to these discharges and relatively high consumption of fish, some minority and low-income communities have greater exposure to, and are therefore at greater risk from, pollutants in steam electric power plant discharges.

The rule sets the first-ever national limits on the levels of toxic pollutants in wastewater that can be discharged from power plants. These standards are strong but reasonable – based on technologies that are readily available and broadly used in the industry today, reinforcing the ongoing trend towards cleaner more modern plants. The standards provide flexibility in implementation through a phased-in approach, allowing plant owners to pursue integrated strategies to meet these and other recent environmental requirements.

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